

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LINKSMART WIRELESS  
TECHNOLOGY, LLC

Plaintiff(s),

vs.

WYNN RESORTS, LIMITED.

Defendant(s).

Case # 2:18-cv-00868-KJD-GWF

**VERIFIED PETITION FOR  
PERMISSION TO PRACTICE  
IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED  
TO THE BAR OF THIS COURT  
AND DESIGNATION OF  
LOCAL COUNSEL**

FILING FEE IS \$250.00

Benjamin T. Wang, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Russ August & Kabat

(firm name)

with offices at 12424 Wilshire Boulevard, 12th Floor,  
(street address)

Los Angeles, California, 90025,  
(city) (state) (zip code)

310-826-7474, bwang@raklaw.com.  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

LinksMart Wireless Technology, LLC to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

3. That since 12/05/2003  
(date), Petitioner has been and presently is a  
member in good standing of the bar of the highest Court of the State of California  
(state) where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
possession of the United States in which the applicant has been admitted to practice law certifying  
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Court	Date Admitted	Bar Number
USDC Central District of California	12/11/2003	228712
USDC Northern District of California	03/27/2017	228712
USDC Eastern District of Texas	04/11/2007	228712
US Court of Appeal for the Federal Circuit	12/22/2008	228712

5. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

(State "none" if Petitioner has no disciplinary proceedings, etc.) none

1           6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give  
2 particulars if ever denied admission):

(State "none" if Petitioner has never been denied admission.) none

**6**      **7.** That Petitioner is a member of good standing in the following Bar Associations.

(State "none" if Petitioner is not a member of other Bar Associations.) None

10           8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2  
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

12	Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
13	None			
14				
15				
16				
17				
18				

(If necessary, please attach a statement of additional applications)

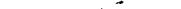
20        9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the  
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same  
22 extent as a member of the State Bar of Nevada.

23           10. Petitioner agrees to comply with the standards of professional conduct required of  
24 the members of the bar of this court.

25        11. Petitioner has disclosed in writing to the client that the applicant is not admitted to  
26 practice in this jurisdiction and that the client has consented to such representation.

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
2 FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF California )  
COUNTY OF Los Angeles )

  
Petitioner's signature

**Petitioner's signature**

**7** Benjamin T. Wang , Petitioner, being first duly sworn, deposes and says:

**8 That the foregoing statements are true.**

  
Petitioner's signature

**Petitioner's signature**

**10** Subscribed and sworn to before me this

11 \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
12

See attached

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**Notary Public or Clerk of Court**

**Notary Public or Clerk of Court**

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO  
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Mark Borghese,  
(name of local counsel)  
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

**23** **10161 Park Run Drive, Suite 150**  
**(street address)**

24 \_\_\_\_\_  
25 Las Vegas, Nevada, 89145  
(city) (state) (zip code)

26 702-382-0200, mark@borgheselaw.com  
(area code + telephone number) (Email address).

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.

4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6

7 The undersigned party(ies) appoint(s) Mark Borghese as  
8 his/her/their Designated Resident Nevada Counsel in this case.

9  
10   
11 (party's signature)

12 Koichiro Ikudome, CEO  
13 (type or print party name, title)

14 (party's signature)

15 (type or print party name, title)

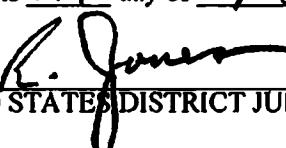
16  
17 **CONSENT OF DESIGNEE**  
18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19   
20 Designated Resident Nevada Counsel's signature

21 6231 mark@borgheselegal.com  
22 Bar number Email address

23 APPROVED:

24 Dated: this 24 day of May, 2018.

25   
26 UNITED STATES DISTRICT JUDGE

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

See Attached Document (Notary to cross out lines 1-6 below)

See Statement Below (Lines 1-6 to be completed only by document signer(s), not Notary)

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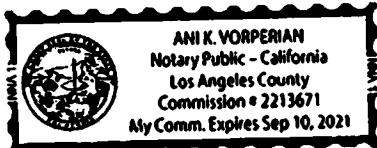
*Signature of Document Signer No. 1*

*Signature of Document Signer No. 2 (if any)*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles



Subscribed and sworn to (or affirmed) before me  
on this 21<sup>st</sup> day of May, 2018,  
by \_\_\_\_\_ Date \_\_\_\_\_ Month \_\_\_\_\_ Year

(1) Benjamin Ting Lee Wang

(and (2) \_\_\_\_\_),

Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence  
to be the person(s) who appeared before me.

Signature Ani K. Vorperian

Signature of Notary Public

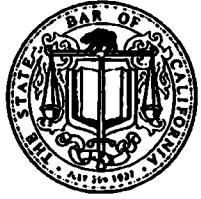
OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or  
fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: \_\_\_\_\_ Document Date: \_\_\_\_\_

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_



**THE STATE BAR  
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

**CERTIFICATE OF STANDING**

May 8, 2018

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BENJAMIN T. WANG, #228712 was admitted to the practice of law in this state by the Supreme Court of California on December 5, 2003; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature consisting of the letters "D" and "V" connected by a horizontal line.

Denise Velasco  
Custodian of Membership Records